an input device for receiving input from the user;

a processor for processing said input;

an output message buffer for storing a plurality of messages output to

the user; and

a transaction store for storing a type of allowable response for each of the messages output to the user;

wherein the processor determines whether the input is an allowable response to a most recent one of the messages output to the user, and if not, determining whether the input is an allowable response to a previous one of the messages output to the user.

#### **REMARKS**

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-16 and 20-30 are pending in this application.

Attached hereto is a marked-up version of the changes made to the claims by the current Amendment. The attached is captioned "Version With Markings to Show Changes Made." The above amendments to claims 24 and 29 involve a correction to the claims to improve the clarity thereof.

## Rejection Under 35 U.S.C. §102:

Claims 1-16 and 20-30 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Lee et al (U.S. '057, hereinafter "Lee"). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Applicant respectfully submits that Lee fails to disclose each element of the claimed invention. For example, Lee fails to disclose storing data representative of messages output by an output device, determining whether an input is an allowable response to a most recent one of the messages, and if not, determining whether the input is an allowable response to a preceding message as required by independent claim 1 and its dependents. Similar comments apply to independent claims 24, 28 and 29 and their respective dependents.

Through the above feature, an exemplary system of the present invention is capable of storing not only the most recent question asked but also at least one previous question. The system thus has the capability of interpreting a user's input as containing information relevant to a previous question if it is determined that the user's input is not relevant to the most recent question. (See, e.g., page 15, lines 5-11 of the specification.)

The Office Action apparently alleges that Figs. 1 and 7 and/or cols. 5-7 of Lee disclose this claimed feature. (See page 3 of the Office Action.)

Applicant has reviewed each of these specifically identified Figs. and passages and respectfully disagrees. Lee discloses a technique for automatically recognizing key words in speech utilizing two types of models, one type for defined vocabulary words (e.g., collect, calling card, person, third-number and operator) and one type for extraneous input. Lee, however, fails to disclose the above claimed feature.

Applicant submits that Lee further fails to teach or suggest a training apparatus for training a user to engage in transactions with another person whom the apparatus is arranged to simulate or an "interactive dialogue apparatus". Rather than training a user to engage in transactions with another person whom the apparatus is arranged to simulate, Lee merely discloses a technique for receiving speech and automatically recognizing selected key words in the speech.

With respect to claims 2, 25 and 30, Applicant submits that Lee fails to disclose a rule store storing grammar rules comprising criteria specifying correct relationships between words of a lexical store, and, associated with a first rule, one or more second rules each corresponding to one of the first rules but with one relationship criterion relaxed. Applicant further submits that Lee fails to disclose training a user to engage in transactions with another person or an interactive dialogue apparatus as discussed above.

Accordingly, Applicant respectfully submits that claims 1-16 and 20-30 are not anticipated by Lee and respectfully requests that the rejection of these claims under 35 U.S.C. §102(e) be withdrawn.

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### **Conclusion:**

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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# VERSION WITH MARKINGS TO SHOW CHANGES MADE IN THE CLAIMS:

24. (Amended) An interactive dialogue apparatus for <u>simulating</u> dialogue with a user, the apparatus comprising:

an output device for outputting messages to the user;

an input device for receiving input from the user;

a lexical store for storing data relating to individual words;

a rule store for storing rules specifying grammatically allowable relationships between words of said input;

a processor for processing said input to recognize occurrence in the input of words stored in said lexical store and in the relationships specified by the rules stored in said rule store;

an output message buffer for storing data representative of a plurality of messages output to said user; and

a transaction store for storing data defining, for each of said messages, a type of allowable response;

said processor being responsive to an input from said user, to the data stored in the output message buffer and to the data stored in the transaction store to:

(a) determine whether said input is an allowable response to a most recent one of the messages represented by data stored in the output message buffer; and

- (b) if said input is determined not to be an allowable response to a most recent one of the messages, determine whether said input is an allowable response to another one of the messages represented by data stored in the output message buffer.
- 29. (Amended) An interactive dialogue apparatus for <u>simulating</u> dialogue with a user, the apparatus comprising:

an output device for outputting messages to the user;

an input device for receiving input from the user;

a processor for processing said input;

an output message buffer for storing a plurality of messages output to the user; and

a transaction store for storing a type of allowable response for each of the messages output to the user;

wherein the processor determines whether the input is an allowable response to a most recent one of the messages output to the user, and if not, determining whether the input is an allowable response to a previous one of the messages output to the user.

PROPOSED DRAWING AMENDMENTS 09/051,070 OIPE FOR SN\_ JAN 2 8 2003 Fig.8 206 -208 ·214a 214-208a 214b 208b **TRANSACTION** LEX (PRICE) 208n 214n - 216a 210a 210 216 210b -216b **RESPONSE RULES** 210n 218 SYNTACTIC CATEGORY 212 212a 212b WORD ENDING MOVE **BUFFER** -220

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